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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CISCO SYSTEMS, INC.,

Plaintiff,

vs.

ARISTA NETWORKS, INC.,

Defendant.

CASE NO. 5:14-cv-5344-BLF

**DECLARATION OF JOHN NEUKOM IN
SUPPORT OF PLAINTIFF CISCO
SYSTEMS, INC.'S OPPOSITION TO
PARTIALLY UNOPPOSED MOTION TO
STAY PATENT CLAIMS PENDING
INTER PARTES REVIEW**

1 I, John Neukom, hereby declare as follows:

2 1. I am a partner at Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Plaintiff
3 Cisco Systems, Inc. I submit this declaration in support of the Cisco's Opposition to Arista's
4 Motion to Stay Patent Claims. I have personal knowledge of the following facts, and would
5 competently testify to them if called upon to do so.
6

7 2. To date in this case, Cisco has produced 746,674 documents in this case, spanning
8 millions of pages. Arista has produced 910,206 documents in this case, spanning millions of
9 pages. The parties have conducted approximately 50 depositions, and (through counsel and
10 experts) have spent many hours inspecting source code and hardware relevant to infringement of
11 the '526 Patent.

12 3. On June 3, counsel for Cisco served the expert report of Kevin Jeffay, opining to
13 Arista's infringement of the '526 patent. That report is 91 pages in length and includes 5 exhibits.
14 On the same date, counsel for Arista served the expert report of Douglas W. Clark, purportedly
15 opining to Arista's views of the invalidity of the '526 patent. That report is 120 pages in length and
16 includes 5 exhibits.
17

18 4. Attached hereto as Exhibit 1 is a true and correct copy of Cisco's Amended
19 Infringement Contentions for U.S. Patent No. 7,047,526 by '526 Accused Instrumentalities that
20 incorporate EOS+ and/or vEOS, served on December 14, 2015.
21

22 5. Attached hereto as Exhibit 2 is a true and correct copy Cisco's Amended
23 Infringement Contentions for U.S. Patent No. 7,953,886 by '886 Accused Instrumentalities
24 Integrated with XMPP and/or eAPI, Including EOS+, served on December 14, 2015.

25 6. Attached hereto as Exhibit 3 is a true and correct copy of Defendant Arista
26 Network, Inc's Preliminary Election of Asserted Prior Art, dated November 18, 2015.
27

1 I declare under penalty of perjury that the foregoing is true and correct. Executed on June
2 6, 2016.

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4 By /s/ John M. Neukom
John M. Neukom
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SIGNATURE ATTESTATION

I, Andrew Holmes, am the ECF user whose userid and password authorized the filing of this document. Under Civil L.R. 5-1(i)(3), I attest that John Neukom has concurred in this filing. Furthermore, I hereby attest that I have on file all holographic signatures corresponding to any signatures indicated by a conformed signature (/S/) within this e-filed document.

Dated: June 6, 2016

/s/ Andrew M. Holmes

Andrew M. Holmes